```
1
     AIMEE CLARK NEWBERRY, ESQ.
     Nevada Bar No. 11084
 2
     CLARK NEWBERRY LAW FIRM
     410 S. Rampart Blvd., Suite #390
 3
     Las Vegas, Nevada 89145
     T: (702) 608-4232
 4
     F: (702) 946-1380
 5
     aclarknewberry@cnlawlv.com
     Attorney for Collegium Fund LLC Series #31
 6
                                UNITED STATES DISTRICT COURT
 7
                                       DISTRICT OF NEVADA
 8
     COLLEGIUM FUND LLC SERIES #31, a
                                                     CASE NO.:
                                                                 2:22-cv-00678-RFB-BNW
 9
     Nevada limited liability company,
10
                            Plaintiff,
                                                     STIPULATION AND ORDER TO EXTEND
     VS.
11
                                                     TIME TO RESPOND TO NEWREZ LLC
     NEWREZ LLC F/K/A NEW PENN
                                                     F/K/A NEW PENN FINANCIAL, LLC,
12
     FINANCIAL, LLC, D/B/A SHELLPOINT
                                                     D/B/A SHELLPOINT MORTGAGE
13
     MORTGAGE SERVICING; QUALITY
                                                     SERVICING'S MOTION TO EXPUNGE
     LOAN SERVICE CORPORATION; DOE
                                                     THE LIS PENDENS
                                              )
14
     individuals I through XX; and ROE
                                                     (Second Request)
     CORPORATIONS I through XX,
15
                               Defendants.
16
17
                  Plaintiff Collegium Fund LLC Series #31 (Collegium #31) and Defendant NewRez
18
     LLC f/k/a New Penn Financial, LLC, d/b/a Shellpoint Mortgage Servicing ("Shellpoint"), by and
19
20
     through their attorneys of record, hereby submit this Stipulation for an extension of time for Collegium
21
     #31 to respond to Shellpoint's Motion to Expunge the Lis Pendens [Doc #16] ("Motion to Expunge"),
22
     from the current date of August 9, 2022 to August 24, 2022.
23
           This is the second request for an extension of time to respond to the Motion to Expunge. This
24
     extension is sought in good faith, and is not intended to cause any delay or prejudice to any party. This
25
     extension is being requested to give the parties additional time to discuss settlement. Additionally,
26
     Shellpoint served Collegium #31 with an offer of judgment on July 20, 2022, with a deadline to accept
27
28
     of August 10, 2022
```

1 Case No 2:22-cv-00678-RFB-BNW Stipulation and Order to Extend Time 2 3 IT IS SO STIPULATED. 4 DATED this 8<sup>th</sup> day of August 2022 DATED this 8<sup>th</sup> day of August 2022 5 **CLARK NEWBERRY LAW FIRM** AKERMAN LLP 6 7 /s/ Aimee Clark Newberry /s/ Paige L. Magaster AIMEE CLARK NEWBERRY, ESQ. ARIEL E, STERN, ESQ. 8 Nevada Bar No. 11084 Nevada Bar No. 8276 410 S. Rampart Blvd., Suite 390 MELANIE D. MORGAN, ESQ. 9 Las Vegas, NV 89145 Nevada Bar No. 8215 10 Attorney for Collegium #31 NATALIE L. WINSLOW, ESQ. Nevada Bar No. 12125 11 PAIGE L. MAGASTER, ESQ. Nevada Bar No. 15557 12 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 13 Attorneys for Shellpoint 14 15 IT IS HEREBY ORDERED that Plaintiff Collegium Fund LLC Series #31 shall file its 16 response to NewRez LLC f/k/a New Penn Financial, LLC, d/b/a Shellpoint Mortgage Servicing's 17 Motion to Expunge the Lis Pendens [Doc #16] on or before August 24, 2022. 18 19 20 United States Magistrate Judge 21 DATED: August 17, 2022 22 Respectfully submitted by: 23 24 **CLARK NEWBERRY LAW FIRM** 25 /s/ Aimee Clark Newberry AIMEE CLARK NEWBERRY, ESQ. 26 Nevada Bar No. 11084 410 S. Rampart Blvd., #390 27 Las Vegas, NV 89145 28 Attorney for Collegium #31